

1 **James P. Laurick, OSB # 821530**
jlaurick@kilmerlaw.com

2 **Alisa D. Hardy, OSB # 105886**
ahardy@kilmerlaw.com

3 Kilmer, Voorhees & Laurick, P.C.
Attorneys at Law
4 732 N.W. 19th Avenue
Portland, Oregon 97209-1302
5 Telephone: (503) 224-0055
Fax: (503) 222-5290

Judge : Randall L. Dunn
Chapter : 7
Hearing Date :
Hearing Time :
Location :

6
7 OF ATTORNEYS FOR FREE BREEZE
ENERGY SYSTEMS, LTD.

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11 UNITED STATES BANKRUPTCY COURT
12 DISTRICT OF OREGON

13 In re:

14 HENRIK NORREMARK,

15 Debtor.

Case No. 14-35766-RLD7

MOTION TO APPEAR FOR 2004 EXAM

16
17 **LBR 2004-1 CERTIFICATION**

18 I hereby certify that on March 3, 2015 I spoke with debtor's counsel, Ted A. Troutman,
19 and advised him as to the filing of this Motion and Order to Appear for 2004 Exam. On March
20 5, 2015, counsel advised that he does not object. I further certify that this Motion and Order
21 were served not less than 14 days prior to the 2004 Exam.

22 Pursuant to Bankruptcy Rule 2004(a), Creditor Free Breeze Systems, Ltd. ("Free
23 Breeze") seeks an order for the examination of Christopher Buck on March 20, 2015 at 9:00 a.m.
24 at DTI, 921 SW Washington St., Portland, OR 97205. Mr. Buck shall be subject to questions by
25 Free Breeze before a court reporter. The debtor's attorney may cross-examine Mr. Buck.

26 ///

1 Free Breeze further seeks an order allowing service of the Order for a 2004 Examination
2 be made on Mr. Buck via email at c.buck@alignfootwear.com and via regular US Mail to his
3 confirmed mailing address at 1830 NW Riverscape Street, #403, Portland, Oregon 97209.

4 Mr. Buck is currently in China for work, but has agreed via email to a 2004 exam on
5 March 20, 2015. Declaration of Alisa Hardy ("Hardy Dec."), Ex. 1.

6 Free Breeze has been attempting to depose Mr. Buck since July of 2014. Mr. Buck has
7 either refused service of the subpoena or failed to appear for agreed upon deposition dates.
8 Counsel for Free Breeze has previously spoken with Mr. Buck on the phone and has
9 corresponded with Mr. Buck via his email address. Hardy Dec. Free Breeze has also been
10 unable to perfect personal service on Mr. Buck because he lives and works in a locked
11 condominium complex, which is the same residence as debtor. Hardy Dec., Ex. 2.

12 The debtor has testified that Mr. Buck resides with the debtor, currently supports the
13 debtor, and was an officer of R&N US Holdings, Inc. ("R&N"), an entity owned by the debtor.
14 The debtor has also testified that Mr. Buck has specific knowledge regarding the business
15 dealings and assets of R&N. Mr. Buck is also currently an officer for Align Footwear LLC, a
16 company which has had business dealings with the debtor within the last year. For these reasons,
17 it is critical that Free Breeze obtain Mr. Buck's testimony.

18 For the foregoing reasons, Free Breeze respectfully requests an order for the examination
19 of Christopher Buck and requests that service of said order may be made via email and regular
20 US mail at Mr. Buck's verified address.

21 DATED this 5th day of March, 2015.

22 KILMER, VOORHEES & LAURICK, P.C.

23 /s/ Alisa D. Hardy

24 James P. Laurick, OSB # 821530

25 jlaurick@kilmerlaw.com

26 Alisa D. Hardy, OSB # 105886

ahardy@kilmerlaw.com

Phone No.: 503-224-0055 / Fax No.: 503-222-5290

Of Attorneys for Free Breeze Energy Systems, Ltd.

E:\10219\0001\Pleadings - Norremark BK\Motion for 2004 Exam (Buck).doc

1 **CERTIFICATE OF SERVICE**

2 I certify that on this 5th day of March, 2015, the foregoing MOTION TO APPEAR FOR
3 2004 EXAM will be served in accordance with the Court's CM/ECF system which will send
4 notification of such filing by notice via email to the ECF participants of record a true copy of the
5 foregoing document, and was also served on the following by ☐ hand delivery ☐ overnight
6 delivery ☐ fax ☒ email ☒ mailing by depositing with the U.S. mail in Portland, Oregon,
7 enclosed in a sealed envelope with first class postage prepaid. Addressed as follows:

8 Ted A. Troutman, OSB # 844470
9 Troutman Law Firm, PC
10 5075 SW Griffith Dr., Ste. 220
11 Beaverton, OR 97005
12 Phone: (503) 292-6788
13 Fax: (503) 596-2371
14 Email: tedtroutman@sbcglobal.net
15 Of Attorneys for Debtor Henrik Norremark

16 /s/ Alisa D. Hardy
17 James P. Laurick, OSB # 821530
18 jlaurick@kilmerlaw.com
19 Alisa D. Hardy, OSB # 105886
20 ahardy@kilmerlaw.com
21 Of Attorneys for Free Breeze Energy Systems, Ltd.
22
23
24
25
26

1 **James P. Laurick, OSB # 821530**

jlaurick@kilmerlaw.com

2 **Alisa D. Hardy, OSB # 105886**

ahardy@kilmerlaw.com

3 Kilmer, Voorhees & Laurick, P.C.

Attorneys at Law

4 732 N.W. 19th Avenue

Portland, Oregon 97209-1302

5 Telephone: (503) 224-0055

Fax: (503) 222-5290

6 OF ATTORNEYS FOR FREE BREEZE

7 ENERGY SYSTEMS, LTD.

Judge

Chapter

Hearing Date

Hearing Time

Location

: Randall L. Dunn

: 7

:

:

:

11 UNITED STATES BANKRUPTCY COURT

12 DISTRICT OF OREGON

13 In re:

14 HENRIK NORREMARK,

15 Debtor.

Case No. 14-35766-RLD7

**DECLARATION OF ALISA HARDY IN
SUPPORT OF MOTION TO APPEAR
FOR 2004 EXAM**

17 I, Alisa Hardy, being first duly sworn, depose and say that:

18 1. I represent Creditor Free Breeze Energy Systems, Ltd., in the above matter and
19 make this Declaration based on my personal knowledge.

20 2. Attached as Exhibit 1 is a true copy of the email correspondence with Christopher
21 Buck wherein he agreed to be examined on March 20, 2015.

22 3. Attached as Exhibit 2 is an Affidavit of Non-service on Mr. Buck's address,
23 correspondence and subpoenas sent to Mr. Buck.

24 **I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE**
25 **BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND THEY ARE**

26 ///

1 **MADE FOR USE AS EVIDENCE IN COURT AND ARE SUBJECT TO PENALTY FOR**
2 **PERJURY.**

3 DATED this 5th day of March, 2015.

4 KILMER, VOORHEES & LAURICK, P.C.

5
6 /s/ Alisa D. Hardy

Alisa D. Hardy, OSB # 105886

7 ahardy@kilmerlaw.com

8 Phone No.: 503-224-0055

9 Fax No.: 503-222-5290

Of Attorneys for Free Breeze Energy Systems, Ltd.

E:\10219\0001\Pleadings - Norremark BK\Dec of ADH re Motion for 2004 Exam

(Buck).doc

1 **CERTIFICATE OF SERVICE**

2 I certify that on this 5th day of March, 2015, the foregoing DECLARATION OF ALISA
3 HARDY IN SUPPORT OF MOTION TO APPEAR FOR 2004 EXAM will be served in
4 accordance with the Court's CM/ECF system which will send notification of such filing by
5 notice via email to the ECF participants of record a true copy of the foregoing document, and
6 was also served on the following by ☐ hand delivery ☐ overnight delivery ☐ fax ☒ email ☒
7 mailing by depositing with the U.S. mail in Portland, Oregon, enclosed in a sealed envelope with
8 first class postage prepaid. Addressed as follows:

9 Ted A. Troutman, OSB # 844470
10 Troutman Law Firm, PC
11 5075 SW Griffith Dr., Ste. 220
12 Beaverton, OR 97005
13 Phone: (503) 292-6788
14 Fax: (503) 596-2371
15 Email: tedtroutman@sbcglobal.net
16 Of Attorneys for Debtor Henrik Norremark

17 /s/ Alisa D. Hardy
18 James P. Laurick, OSB # 821530
19 jlaurick@kilmerlaw.com
20 Alisa D. Hardy, OSB # 105886
21 ahardy@kilmerlaw.com
22 Of Attorneys for Free Breeze Energy Systems, Ltd.
23
24
25
26

Shellice R. Gratreak

From: Alisa D. Hardy
Sent: Tuesday, February 17, 2015 12:05 PM
To: 'Chris Buck'
Subject: RE: In re Henrik Norremark / U.S. Bankruptcy Court District of Oregon Case No. 14-35766

Chris,

Thank you for your earlier email. I just wanted to follow up with you to confirm the March 20th date. I completely understand your time constraints, however, to be fair I have been trying to take your deposition since last July.

Finally, given that you are in China, may I serve your subpoena by email, or would you prefer that I obtain an order from the bankruptcy court?

Thanks,

ALISA D. HARDY
Kilmer, Voorhees & Laurick, PC
732 N.W. 19th Avenue
Portland, Oregon 97209
503/224-0055 (office)
ahardy@kilmerlaw.com
www.kilmerlaw.com

From: Chris Buck [mailto:c.buck@alignfootwear.com]
Sent: Monday, January 26, 2015 3:01 PM
To: Alisa D. Hardy
Subject: Re: In re Henrik Norremark / U.S. Bankruptcy Court District of Oregon Case No. 14-35766

Alisa

I have a business to run which requires me to travel extensively. I am doing my best to accommodate you and the court but really have nothing to offer these proceedings that I believe is either useful or helpful, and although I accept you may believe otherwise it is extremely difficult for me to take the time from my schedule to accommodate your request.

Again I can offer you a video deposition much sooner than the requested date if you advise me I will make the arrangements, failing which please set a date as close to [March 20th](#) and I will bend over backwards to be there.

Chris buck

Sent from my iPhone

On Jan 27, 2015, at 6:28 AM, Alisa D. Hardy <AHardy@kilmerlaw.com> wrote:

Exhibit 1
Page 1 of 6

Chris,

Thank you for the quick response. You previously stated that you would be back in the US by the end of February- I am confused as to why now you are not available until mid-April. Under the Federal Bankruptcy Court's current schedule, the deposition must take place by March 20. The court will need a good reason for delaying the proceedings further.

I am happy to work with you, however I do not have an unlimited ability to accommodate your schedule.

Thank you.

ALISA D. HARDY

Kilmer, Voorhees & Laurick, PC
732 N.W. 19th Avenue
Portland, Oregon 97209
503/224-0055 (office)
ahardy@kilmerlaw.com
www.kilmerlaw.com

From: Chris Buck [<mailto:c.buck@alignfootwear.com>]

Sent: Monday, January 26, 2015 1:48 PM

To: Alisa D. Hardy

Subject: Re: FW: In re Henrik Norremark / U.S. Bankruptcy Court District of Oregon Case No. 14-35766

Alisa

I need to check on a couple things due to the fact that I'll still be here in China, the second week of April would probably work. If something changes I'll advise you.

Chris Buck

On Mon, Jan 26, 2015 at 1:41 PM, Alisa D. Hardy <AHardy@kilmerlaw.com> wrote:

Chris,

I have not received a response to my last email. Please advise of your availability on the dates of March 13-20.

Thank you,

ALISA D. HARDY

Kilmer, Voorhees & Laurick, PC

732 N.W. 19th Avenue

Portland, Oregon 97209

Exhibit 1
Page 2 of 6

[503/224-0055](tel:5032240055) (office)

ahardy@kilmerlaw.com

www.kilmerlaw.com

From: Alisa D. Hardy
Sent: Monday, January 19, 2015 9:25 AM
To: 'Chris Buck'
Subject: RE: FW: In re Henrik Norremark / U.S. Bankruptcy Court District of Oregon Case No. 14-35766

Thank you for your email Chris. We can accommodate your schedule and can have the deposition sometime between March 13-20. Please advise whether you are available one or more of these days and I will confer with Mr. Norremark's attorney.

Thank you.

ALISA D. HARDY

Kilmer, Voorhees & Laurick, PC

732 N.W. 19th Avenue

Portland, Oregon 97209

[503/224-0055](tel:5032240055) (office)

ahardy@kilmerlaw.com

www.kilmerlaw.com

From: Chris Buck [<mailto:c.buck@alignfootwear.com>]
Sent: Thursday, January 15, 2015 3:40 PM
To: Alisa D. Hardy
Subject: Re: FW: In re Henrik Norremark / U.S. Bankruptcy Court District of Oregon Case No. 14-35766

Alisa

Exhibit 1
Page 3 of 6

Im currently in out of Xiamen China, I will want counsel present any at any meeting I have, therefore I'll sit down when I get back. The expected date of return is the 4th week of February subject to change a week earlier or a week later.

Thank You

Chris

On Thu, Jan 15, 2015 at 8:55 AM, Alisa D. Hardy <AHardy@kilmerlaw.com> wrote:

Thank you for your email Chris. Please advise of where you are staying in China (and therefore available by video) and the date you will be back in Portland so we can determine the best way to handle your absence.

Thank you,

ALISA HARDY

Kilmer, Voorhees & Laurick, PC

732 N.W. 19th Avenue

Portland, Oregon 97209

[503/224-0055](tel:5032240055) (office)

ahardy@kilmerlaw.com

www.kilmerlaw.com

From: Chris Buck [<mailto:c.buck@alignfootwear.com>]

Sent: Wednesday, January 14, 2015 5:22 PM

To: Shellice R. Gratreak

Subject: Re: In re Henrik Norremark / U.S. Bankruptcy Court District of Oregon Case No. 14-35766

Exhibit 1
Page 4 of 6

To Whom It May Concern:

I'm in receipt of your email, I'm currently in China for an extended period of time and although I may be returning to Portland it may be hours not days therefore I'm not currently able to commit to attend this deposition other than by video or webcam if this can be arranged remembering the time difference of 16 hours.

Of course if my calendar clears up I'll advise you.

Thanks

Christopher Buck

On Wed, Jan 14, 2015 at 3:25 PM, Shellice R. Gratrek <SGratrek@kilmerlaw.com> wrote:

Please see attached. Thank you.

Shellice R. Gratrek

Legal Assistant to Peter J. Viteznik, Alisa D. Hardy and Robert S. May

Kilmer, Voorhees & Laurick, P.C.
732 NW 19th Avenue

Portland, OR 97209

Phone: [503-224-0055](tel:503-224-0055)

Fax: [503-222-5290](tel:503-222-5290)

sgratrek@kilmerlaw.com

CONFIDENTIALITY NOTICE

This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail

in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

--

Christopher buck

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

FREE BREEZE ENERGY SYSTEMS, LTD.,

Plaintiff,

vs.

Case No. 1401-00987

NOT FOUND AFFIDAVIT

R&N US HOLDINGS, INC., et al.,

Defendant.

STATE OF OREGON
County of Multnomah

ss.

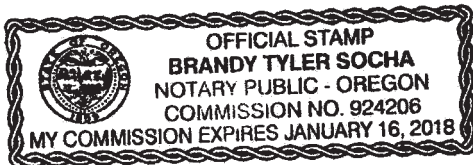
I, Mitch Wirth, being first duly sworn, depose and say that I am a professional process server, a competent person 18 years of age or older, a resident of the State of Oregon and that I am not a party to nor an attorney for any party, corporate or otherwise, in the within named action; that I attempted to serve the *Order for Examination of Judgment Debtor and Restraining Order; Plaintiff's Ex Parte Motion for Examination of Judgment Debtor Henrik Norremark and Restraining Order; Declaration of Alisa Hardy in Support of Plaintiff's Motion for Examination of Debtor Henrik Norremark upon **HENRIK NORREMARK*** as herinafter described:

On 06/06/2014 at 6:22 PM, I attempted personal service upon the defendant at 1830 NW Riverscape St., #403, Portland, OR 97209. This address is the "Pacifica" Condominiums. Access is secured. The name of Norremark does not exist on the tenant directory at the main entrance.

I declare under the penalty of perjury that the above statement is true and correct.

SUBSCRIBED AND SWORN BEFORE ME
this 5 day of March, 2016
by Mitch Wirth.

Brandy Socha
Notary Public for Oregon



X Mitch Wirth
Mitch Wirth
Nationwide Process Service, Inc.
1201 S.W. 12th Avenue, Suite 300
Portland, OR 97205
503-241-0636
Ref#: 10219-0001



388896

Exhibit 2
Page 1 of 12

KILMER, VOORHEES & LAURICK, P.C.

A Professional Corporation
ATTORNEYS AT LAW

732 N.W. 19th AVENUE
PORTLAND, OREGON 97209

TELEPHONE (503) 224-0055
FAX (503) 222-5290

Alisa D. Hardy
ahardy@kilmerlaw.com
Admitted in Oregon

July 2, 2014

Christopher Buck
1830 NW Riverscape Street, #403
Portland, OR 97209

Re: *Free Breeze Energy Systems, Ltd. v. R&N US Holdings, Inc., et al.*
Multnomah County Circuit Court Case No. 1401-00987
Our File No. 10219-0001

Dear Mr. Buck:

Enclosed is a subpoena ordering your appearance at a deposition and production of documents at our offices on July 24, 2014 at 9:00 a.m. Please contact our office if you absolutely need to adjust the schedule. In addition, please let me know if you require a process server or Sheriff to formally serve this subpoena.

Thank you in advance for your cooperation.

Sincerely,

/s/ Alisa D. Hardy

Alisa D. Hardy

ADH:srg
Enclosure

I:\10219\0001\Correspondence\Buck re subpoena 20140702.doc

Exhibit 2
Page 2 of 12

1
2
3
4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MULTNOMAH

6 FREE BREEZE ENERGY SYSTEMS,
7 LTD.,

8 Plaintiff,

9 v.

10 R&N US HOLDINGS, INC., a California
11 corporation, and HENRIK NORREMARK,

12 Defendants.

Case No. 1401-00987

**SUBPOENA DUCES TECUM TO
CHRISTOPHER BUCK**

Appearance Required

13 **TO: Christopher Buck, 1830 NW Riverscape Street, #403, Portland, OR 97209.**

14 Pursuant to Oregon Rule of Civil Procedure 55 F and ORS 18.269, you are hereby
15 required to appear at the law offices of Kilmer, Voorhees & Laurick, P.C., 732 NW 19th
16 Avenue, Portland, Oregon 97209, on the **24th day of July, 2014 at 9 a.m.** to testify as a witness
17 in the above entitled cause and to produce the following records, books, papers, documents, or
18 other tangible things.

19 Pursuant to ORCP 55 D(4) service of this subpoena via first class mail is effective.

20 For purposes of this subpoena:

21 1. "Record" or "records" means "writing, drawings, graphs, charts, photographs,
22 phono-records, and other data compilations from which information can be "obtained" as those
23 terms are defined in Oregon Rule of Civil Procedure 43, and includes without limitation any
24 written, printed, typed, photocopied, photographic or recorded matter of any kind or character in
25 your possession, custody, or control, however produced or reproduced, whether prepared by you
26 or others including, but not limited to all correspondence, drafts, calendars, desk pads, written

Page 1 - SUBPOENA DUCES TECUM TO CHRISTOPHER BUCK

Exhibit 2
Page 3 of 12

KILMER, VOORHEES & LAURICK, P.C.
A PROFESSIONAL CORPORATION
732 N.W. 19TH AVENUE
PORTLAND, OREGON 97209-1302
(503) 224-0055 · FAX (503) 222-5290

1 phone messages, emails (both printed and electronic format), memoranda, notes, reports,
2 manuals, drawings, graphs, charts, lists, and entries in books of account, specifically including
3 every copy of a document that is not identical to the original (whether because of notes made on
4 or attached to such copy or otherwise), and all attachments and enclosures to any document.

5 2. "You" or "your" means **Christopher Buck**, and your affiliates, employees,
6 agents, attorneys, representatives, or other persons or entities acting on your behalf.

7 3. "Relating to" or "related to" means, without limitation, comprising, concerning,
8 containing, consisting of, embodying, identifying, referring to, corresponding to, in connection
9 with, commenting on, in response to, about, announcing, explaining, discussing or reflecting.

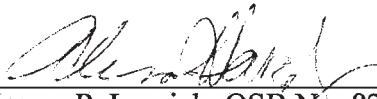
10 **YOU ARE COMMANDED TO MAKE AVAILABLE** the following:

- 11 1. All record's relating in any way to Henrik Norremark's ("Norremark") involvement
12 or affiliation with You.
- 13 2. All records related to Norremark's ownership interest, employment, or any other
14 involvement with any entities in which You are a shareholder, member, or owner,
15 including but not limited to documents pertaining to any operating agreement,
16 disbursements, profits or dividends paid to Norremark.
- 17 3. All 1099-DIV or IRS K-1 Schedules reflecting any involvement of Norremark with
18 any entities or ventures in which You are a shareholder, member, or owner.
- 19 4. All records relating to Norremark's employment or his retention as an independent
20 contractor by any entities in which You are a shareholder, member, or owner,
21 including payroll records, W-2s, or 1099s;
- 22 5. All records relating to Norremark's investments or payment of funds to You or to
23 entities in which You are a shareholder, member or owner
- 24 6. All records related to the assets and liabilities of any in entities with which Norremark
25 is affiliated, including Profit and Loss statements and federal and state tax returns for
26 each entity for the last three years.

- 1 7. All records relating to money loaned by or from Norremark or R&N US Holdings
2 Inc., to You or an entity in which You are a shareholder, member, or owner.
3 8. All records related to the assets and liabilities of R&N La Costa Properties, LLC.,
4 New Energy Ventures, Inc., Ellis Street Townhomes, LLC, Powell Butte Condos,
5 LLC.

6 DATED this 2nd day of July, 2014.

7 KILMER, VOORHEES & LAURICK, P.C.

8 

9 James P. Laurick, OSB No. 82153

10 jlaurick@kilmerlaw.com

11 Alisa Hardy, OSB No. 105886

12 ahardy@kilmerlaw.com

13 Phone No.: 503-224-0055

14 Fax No.: 503-222-5290

15 Of Attorneys for Plaintiff

16 Trial Attorney: James P. Laurick

17 I:\10219\0001\Pleadings\SDT to Chris Buck (Portland address).doc

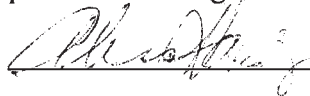
18
19 I hereby certify that the foregoing is a complete and exact copy of the original subpoena
20 in the above-entitled cause as the same appears in my hands for service.

21
22 IF AN OFFICER, STATE TITLE

23
24
25
26
Witness Fee \$ 30.00
Mileage \$ 00.00
Total \$ 30.00

STATE OF OREGON, County of Multnomah ss:

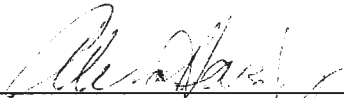
I hereby certify that I served the within subpoena on the 2nd day of July, 2014, on Christopher Buck by mailing to him a copy thereof and giving or offering to him at the same time the fees and mileage to which he is entitled for travel to and from the place designated in said subpoena and one day's attendance; and that I am a competent person over the age of 18 years.



1 **CERTIFICATE OF SERVICE**

2 I certify that on this 2nd day of July, 2014 the foregoing SUBPOENA DUCES TECUM
3 TO CHRISTOPHER BUCK was served on the following by ☐ hand delivery ☐ overnight
4 delivery ☐ fax ☐ email ☒ mailing by depositing with the U.S. mail in Portland, Oregon,
5 enclosed in a sealed envelope with first class postage prepaid. Addressed as follows:

6
7 Henrik Norremark
1830 NW Riverscape Street, #403
Portland, OR 97209

8
9 
10 James P. Laurick, OSB No. 82153
jlaurick@kilmerlaw.com
11 Alisa Hardy, OSB No. 105886
ahardy@kilmerlaw.com
12 Of Attorneys for Plaintiff
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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MULTNOMAH

6 FREE BREEZE ENERGY SYSTEMS,
7 LTD.,

8 Plaintiff,

9 v.

10 R&N US HOLDINGS, INC., a California
11 corporation, and HENRIK NORREMARK,

12 Defendants.

Case No. 1401-00987

**SUBPOENA DUCES TECUM TO ALIGN
FOOTWEAR, LLC**

[Records Only, No Appearance Required
Pursuant to ORCP 55 F(3)]

13 **TO: Align Footwear, LLC**
14 **1830 NW Riverscape Street, #403**
Portland, OR 97209

15 Pursuant to Oregon Rule of Civil Procedure 55 F(3), you are hereby required to produce
16 the following records, books, papers, documents, or other tangible things at the law offices of
17 Kilmer, Voorhees & Laurick, P.C., 732 NW 19th Avenue, Portland, Oregon 97209, on or before
18 August 1, 2014.

19 Pursuant to ORCP 55 D(4) service of this subpoena via first class mail is effective.

20 For purposes of this subpoena:

21 1. "Record" or "records" means "writing, drawings, graphs, charts, photographs,
22 phono-records, and other data compilations from which information can be "obtained" as those
23 terms are defined in Oregon Rule of Civil Procedure 43, and includes without limitation any
24 written, printed, typed, photocopied, photographic or recorded matter of any kind or character in
25 your possession, custody, or control, however produced or reproduced, whether prepared by you
26 or others including, but not limited to all correspondence, drafts, calendars, desk pads, written

Page 1 - SUBPOENA DUCES TECUM TO ALIGN FOOTWEAR,
LLC

Exhibit 2
Page 7 of 12

KILMER, VOORHEES & LAURICK, P.C.
A PROFESSIONAL CORPORATION
732 N.W. 19TH AVENUE
PORTLAND, OREGON 97209-1302
(503) 224-0055 · FAX (503) 222-5290

1 phone messages, emails (both printed and electronic format), memoranda, notes, reports,
2 manuals, drawings, graphs, charts, lists, and entries in books of account, specifically including
3 every copy of a document that is not identical to the original (whether because of notes made on
4 or attached to such copy or otherwise), and all attachments and enclosures to any document.

5 2. "You" or "your" means **Align Footwear, LLC**, its affiliates, employees, agents,
6 attorneys, representatives, or other persons or entities acting on your behalf.

7 3. "Relating to" or "related to" means, without limitation, comprising, concerning,
8 containing, consisting of, embodying, identifying, referring to, corresponding to, in connection
9 with, commenting on, in response to, about, announcing, explaining, discussing or reflecting.

10 **YOU ARE COMMANDED TO MAKE AVAILABLE** the following:

- 11 1. All record's relating in any way to Henrik Norremark's involvement or affiliation
12 with You.
- 13 2. All records related to Henrik Norremark's ownership interest, employment, or any
14 other involvement with You including but not limited to documents pertaining to any
15 operating agreement, disbursements, profits or dividends paid to Norremark;
- 16 3. All 1099-DIV or IRS K-1 Schedules reflecting any involvement of Norremark with
17 You;
- 18 4. All records relating to Norremark's employment or his retention as an independent
19 contractor by You, including payroll records, W-2s, or 1099s;
- 20 5. All records relating to Norremark's investment or payment of funds to You
- 21 6. All records related to Your assets and liabilities including Profit and Loss statements
22 and federal and state tax returns for the last three years.

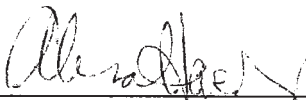
23 To comply with this subpoena, you will need to make available, or mail, the documents
24 sought by **August 1, 2014**, along with an **executed Certificate of Custodian of Records**, which
25 is enclosed with this subpoena.

26 ///

1 If you choose to comply with this subpoena by mailing documents, attach those
2 documents to the Certificate of Records Custodian attached hereto and have the Certificate
3 completed and signed by an authorized employee of your organization.

4 DATED this 18th day of July, 2014.

5 KILMER, VOORHEES & LAURICK, P.C.

6
7 
8 James P. Laurick, OSB No. 82153
9 jlaurick@kilmerlaw.com
10 Alisa Hardy, OSB No. 105886
11 ahardy@kilmerlaw.com
12 Phone No.: 503-224-0055
13 Fax No.: 503-222-5290
14 Of Attorneys for Plaintiff
15 Trial Attorney: James P. Laurick
16 I:\10219\0001\Pleadings\SDT to Align Footwear, LLC 20140718.doc

13
14 I hereby certify that the foregoing is a complete and exact copy of the original subpoena
15 in the above-entitled cause as the same appears in my hands for service.

16
17
18 IF AN OFFICER, STATE TITLE

19
20
21
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23
24
25
26
Witness Fee \$ 30.00
Mileage \$ 00.00
Total \$ 30.00

STATE OF OREGON, County of Multnomah ss:

I certify that on this 18th day of July, 2014, the foregoing
SUBPOENA DUCES TECUM TO ALIGN FOOTWEAR by mailing
him/her a copy thereof by certified mail, together with the fee to
which he/she is entitled; that I am a competent person over the age of
18 years.



KILMER, VOORHEES & LAURICK, P.C.

A Professional Corporation
ATTORNEYS AT LAW

732 N.W. 19th AVENUE
PORTLAND, OREGON 97209

TELEPHONE (503) 224-0055
FAX (503) 222-5290

Alisa D. Hardy
ahardy@kilmerlaw.com
Admitted in Oregon

September 3, 2014

Via Certified and First Class Mail

Align Footwear, LLC
Christopher Buck
1830 NW Riverscape Street, #403
Portland, OR 97209

Re: *Free Breeze Energy Systems, Ltd. v. R&N US Holdings, Inc., et al.*
Multnomah County Circuit Court Case No. 1401-00987
Our File No. 10219-0001

Dear Mr. Buck:

We have not received a response to the subpoena duces tecum issued to Align Footwear, LLC. In the event you did not receive it, enclosed is another copy. Please provide responsive documents by September 18, 2014, or we will be forced to seek further relief from the Court.

In addition, we are entitled to take your deposition. Please provide dates in the month of September in which you are available. If I do not hear from you by Tuesday, September 9, I will choose a date and issue a subpoena duces tecum for your appearance.

I look forward to hearing from you.

Sincerely,

/s/ Alisa D. Hardy

Alisa D. Hardy

ADH:srg
Enclosure

cc: Kathryn P. Salyer
I:\10219\0001\Correspondence\Buck re subpoena 20140903.doc

Exhibit 2
Page 10 of 12

CERTIFIED MAIL[®]



OR 970
03 SEP '14
PM 5 L

KILMER, VOORHEES & LAURICK
A PROFESSIONAL CORPORATION

732 N.W. 19TH AVENUE
PORTLAND, OREGON 97209

10219-0001

7011 1150 0000 9642 1631

SN 10/23/14 Return 10/29/14

Align Footwear, LLC
Christopher Buck
1830 NW Riverscane Street #403
Portland, OR 97011

970 SE 1009 0011/07/14

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

97209163903
9720901302

BC: 97209130232 *1529-09298-03-37

KILMER, VOORHEES & LAURICK, P.C.

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732 N.W. 19th AVENUE
PORTLAND, OREGON 97209

TELEPHONE (503) 224-0055
FAX (503) 222-5290

Alisa D. Hardy
ahardy@kilmerlaw.com
Admitted in Oregon

January 14, 2015

Via Email and First Class Mail

Christopher Buck
Align Footwear, LLC
1830 NW Riverscape Street, #403
Portland, OR 97209
c.buck@alignfootwear.com

Re: *In re Henrik Norremark*
U.S. Bankruptcy Court District of Oregon Case No. 14-35766
Our File No. 10219-0001

Dear Mr. Buck:

This is a follow up to my message left at your contact number listed on the Align Footwear website, 1-888-569-6878. I also attempted to contact you at 971-344-4012 but your voicemail is full, and at 503-775-3165, but this number is disconnected. I will also try contacting you at these numbers again tomorrow.

Pursuant to Federal Bankruptcy Rule 2004 and 9016, we wish to take your deposition relating to the acts, conduct, property, liabilities and financial condition of the debtor, Henrik Norremark, or to any matter which may affect the administration of the debtor's estate, or to the debtor's right to a discharge.

This email and my message is an attempt to confer with you on a mutually agreeable time and location for your deposition to take place. Both Mr. Norremark's counsel and I are available on February 4, 2015 at 9:00 a.m. at DTI, located at 921 SW Washington Street, Portland, OR 97205. Please confirm your availability at this time and location.

If I do not hear from you by Friday, January 16, 2015, I will proceed with issuing a subpoena ordering your appearance. Please be advised that pursuant to Federal Bankruptcy Rule 9016 and Federal Rule of Civil Procedure 45(e), failure to obey a subpoena may result in contempt of court.

Sincerely,

Alisa D. Hardy

Alisa D. Hardy

Exhibit 2
Page 12 of 12

ADH:srg
I:\10219\0001\Correspondence\Buck re appearance 20150114.doc